

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

V.

1:17cr00224-AT-CMS

ALLAN PENDERGRASS

MOTION FOR ADDITIONAL TIME TO FILE PERFECTED MOTION

Comes now the Defendant, by and through counsel and asks for an additional five days to file his perfected motion to dismiss (No.27) in this matter for the reasons enumerated below:

1.

Counsel has been in preparation and on trial out of state until late last week in United States v. Das in Greenville, NC, and has had numerous hearings since his return. That was a complex white collar matter.

2.

The Jewish high holy day of Yom Kippur starts this evening and lasts through September 30th, 2017

WHEREFORE, Defendant prays;

1. That he receive such five additional days until October 4th to perfect said motion which perfection is presently due on September 29, 2017.
2. That any such period of time be excluded under the Speedy Trial Act as such would be necessary in the interests of justice, and
3. For such other relief that this Court deems appropriate.

Respectfully submitted,

S/Robert H. Citronberg

Robert H. Citronberg
Attorney for Defendant
State Bar #126275

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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing motion was served electronically on:

Mr. Jeff Brown
Assistant United States Attorney
Richard B. Russell Courthouse
75 Spring St., SW
Atlanta, Ga. 30303.

This 29th day of September, 2017

S/Robert H. Citronberg

Robert H. Citronberg
Attorney for Defendant Pendergrass (Court
Appointed)

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